

Louis J. Ebert (Bar No. 17527)  
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(410) 649-4995

Attorneys for RL BB ACQ III-MD SHP, LLC

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re: \*

LAMEES ALROMANI, \* Case No. 16-13854

Debtor \* (Chapter 7)

\* \* \* \* \*

**MOTION TO EXTEND TIME TO FILE A COMPLAINT  
TO DETERMINE THE DISCHARGEABILITY OF CERTAIN DEBTS**

RL BB ACQ III-MD SHP, LLC, assignee of RL BB Acquisition, LLC (“RL BB”), by its undersigned attorney, hereby files this motion (the “Motion”) to extend the time to file a complaint to determine the dischargeability of certain debts owed by Lamees Alromani (the “Debtor”) to RL BB pursuant to Rule 4007 of the Federal Rules of Bankruptcy Procedure. In support of the Motion, RL BB respectfully represents as follows:

1. On November 10, 2016, the Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) commencing the instant proceeding.
2. H. Jason Gold has been appointed the Chapter 7 Trustee of the Debtor’s estate.
3. The deadline for filing a complaint to determine the dischargeability of certain debts under Section 523 of the Bankruptcy Code is currently set for February 10, 2017.
4. RL BB holds a judgment against the Debtor, and others, in excess of three million

dollars.

5. RL BB is currently investigating the Debtor's financial and business affairs as well as her entitlement to a discharge of the debt due and owing RL BB. However, RL BB requires more time to make a final determination.

6. Therefore, RL BB requests that the Court extends the deadline to object to the dischargeability of certain debts through and including April 10, 2017 to give RL BB a time in which to investigate and assess the Debtor's entitlement to the discharge of certain debts.

7. RL BB has not previously requested an extension of time in connection with this case.

8. RL BB reserves the right to request an additional extension of time in this case.

9. This Motion need not be accompanied with a memorandum of points and authorities pursuant to Local Bankruptcy Rule 9013-1 (G).

**WHEREFORE**, RL BB respectfully moves this Court to extend the time for RL BB to file a complaint to determine the dischargeability of certain debts pursuant to 11 U.S.C. § 523 through and including April 10, 2017, with leave to request additional extensions, and for such other and further relief as the Court may deem appropriate under the circumstances.

Dated: February 8, 2017

/s/ Louis J. Ebert

Louis J. Ebert (Bar No. 17527)  
Rosenberg Martin Greenberg, LLP  
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Baltimore, MD 21201  
(410) 649-4995

*Attorneys for RL BB ACQ III-MD SHP, LLC*

**NOTICE OF MOTION TO EXTEND TIME TO FILE A COMPLAINT TO DETERMINE THE DISCHARGEABILITY OF CERTAIN DEBTS AND NOTICE OF MOTION**

RL BB ACQ III-MD SHP, LLC, assignee of RL BB Acquisition, LLC (“RL BB”), by counsel, has filed papers with the Court to extend the deadline to object to the dischargeability of certain debts through and including April 10, 2017 (the “Motion”).

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. You must file a response as outlined below if you oppose this motion within **14 days after service of this Notice or February 25, 2017, whichever is later.**

1. File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1. If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
1100 East Main Street, Suite 301  
Richmond, VA 23219

2. You must also mail a copy to:

Louis J. Ebert  
Rosenberg Martin Greenberg, LLP  
25 S. Charles Street, Suite 2115  
Baltimore, MD 21201  
Office of the U.S. Trustee  
600 East Main Street, Suite 301  
Richmond, VA 23219

H. Jason Gold  
Nelson Mullins Riley & Scarborough LLP  
1101 Constitution Avenue, N.W., Suite 900  
Washington, DC 20001

3. No hearing is scheduled at this time. You will receive separate notice if a hearing is scheduled.

**NOTICE**

**UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE TO THE MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE MOVING PARTY WITHIN 14 DAYS OF THE SERVICE OF THIS NOTICE OBJECTING TO THE RELIEF REQUESTED, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE MOTION AS CONCEDED, AND ISSUE AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT FURTHER NOTICE OR HEARING.**

Dated: February 8, 2017

/s/ Louis J. Ebert

Louis J. Ebert (Bar No. 17527)  
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25 South Charles Street, Suite 2115  
Baltimore, MD 21201  
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*Attorneys for RL BB ACQ III-MD SHP, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8<sup>th</sup> day of February, 2017, a copy of the foregoing Motion to extend time to file a complaint to determine the dischargeability of certain debts, notice thereof, and a proposed order granting said relief was served electronically via CM/ECF and/or by first class mail, postage prepaid, on:

Lamees Alromani  
8901 Gallant Green Drive  
McLean, VA 22102

H. Jason Gold  
Nelson Mullins Riley & Scarborough LLP  
101 Constitution Avenue, N.W.  
Suite 900  
Washington, DC 20001

Office of the U.S. Trustee  
600 East Main Street, Suite 301  
Richmond, VA 23219

Richard Owen Bolger  
Bolger Law Firm, PLLC  
10347 Democracy Lane  
Fairfax, VA 22030

Bank of America  
PO Box 26012  
Greensboro, NC 27420

Citi  
P.O. Box 6190  
Sioux Falls, SD 57117

/s/Louis J. Ebert  
Louis J. Ebert

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*Attorneys for RL BB ACQ III-MD SHP, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re: \*

LAMEES ALROMANI, \* Case No. 16-13854

Debtor \* (Chapter 7)

\* \* \* \* \*

**ORDER EXTENDING TIME TO FILE A COMPLAINT  
TO DETERMINE THE DISCHARGEABILITY OF CERTAIN DEBTS**

This matter came before the Court upon RL BB ACQ III-MD SHP, LLC's, assignee of RL BB Acquisition, LLC ("RL BB") motion (the "Motion") to extend the time to file a complaint to determine the dischargeability of certain debts owed by Lamees Alromani (the

“Debtor”), by counsel, and within the time allowed pursuant to Bankruptcy rules 4007(c) and 9006(b). It appearing that RL BB has set forth valid grounds for the requested extension, no objection or response having been filed with this Court, and proper notice of the Motion was served, it is hereby **ORDERED**:

1. The Motion is hereby **GRANTED**.
2. The time for RL BB to file a complaint pursuant to 11 U.S.C. 523 objecting to the Debtor’s discharge of certain debts is hereby extended through and including April 10, 2017.
3. RL BB is granted leave to apply for a further extension of this deadline.
4. Upon entry, the Clerk is directed to send a copy of this Order to all parties on the service list attached hereto.

Entered:

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United States Bankruptcy Judge

I ask for this:

/s/ Louis J. Ebert  
Louis J. Ebert (Bar No. 17527)  
Rosenberg Martin Greenberg, LLP  
25 South Charles Street, Suite 2115  
Baltimore, MD 21201  
(410) 649-4995  
*Attorneys for RL BB ACQ III-MD SHP, LLC*

**CERTIFICATION**

I hereby certify that this Order Extending Deadline for Objecting to Dischargeability of Certain Debts has been served on or endorsed by all necessary parties on February 8, 2017.

/s/ Louis J. Ebert  
Louis J. Ebert

**SERVICE LIST**

Lamees Alromani  
8901 Gallant Green Drive  
McLean, VA 22102

H. Jason Gold  
Nelson Mullins Riley & Scarborough LLP  
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Washington, DC 20001

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